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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, *et al.*, on behalf of
 themselves and all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-3664-LHK-SVK

**DECLARATION OF AMANDA BONN IN
 SUPPORT OF ADMINISTRATIVE
 MOTION TO SEAL PORTIONS OF
 JOINT SUBMISSION RE:
 NOMINATIONS FOR A SPECIAL
 MASTER AND PROPOSED ORDERS**

Referral: Hon. Susan van Keulen, USMJ

DECLARATION OF AMANDA BONN

I, Amanda Bonn, declare as follows.

1. I am a partner with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before courts of the State of California.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. I submit this declaration in accordance with Civil Local Rules 79-5(d) and (e) in support of Plaintiffs' Administrative Motion to Seal:

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Joint Submission Re: Nominations for a Special Master and Proposed Orders	Plaintiffs	Entire Text	Contains Material Satisfying Rule 26(c) Standard
Exhibit A-1 to A-5	Plaintiffs	Entire Exhibits	Contains Material Satisfying Rule 26(c) Standard

4. Plaintiffs have proposed sealing the Joint Submission re Special Master Nominations and Proposed Orders and Exhibit A-1 to A-5 filed in support that have the potential to result in severe reputational harm to Plaintiffs' nominee, endangers the individual's current and future engagements as a special master, and constitutes an effort to impugn the individual's qualifications without the benefit of admissible evidence or an opportunity for Plaintiffs' nominee to respond as he is currently out of the country. Sealing the documents identified above will reduce the risk that Plaintiffs' nominee will suffer such unnecessary damage to his professional reputation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of June 2021, at Los Angeles, California.

/s/ Amanda Bonn